

# COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2019 MAY -8 P 12: 35

STEPHEN C. DRIES  
CLERK

(Full name of plaintiff(s))

Rajko Markovic

v.

Case Number:

**19-C-0675**

(to be supplied by Clerk of Court)

(Full name of defendant(s))

Milwaukee secure Detention Facility

Security Director Miller, Captain

Gegare, Captain Morris, Doctor <sup>HOFFELER</sup> Hoffman

Doctor McGuire, CPT. KARZMERIK

## A. PARTIES

1. Plaintiff is a citizen of Milwaukee WI, and is located at  
(State)

Milwaukee secure Detention Facility P.O Box 05911  
(Address of prison or jail) Milw, WI 53205

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Captain Morris, Captain Gegare, Doctor Hoffman  
Doctor McGuire, security Director Miller (Name)

is (if a person or private corporation) a citizen of \_\_\_\_\_  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Milwaukee secure Detention Facility 1015 N 10<sup>th</sup> street  
Milw WI 53205-0740 (Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

who - Captain Gegare, security Director miller,  
Captain morris, Psychologist Doctor <sup>HOFFELER</sup> Hoffman  
an Doctor Mcquire who are employ at Milwaukee  
Secure Detention Facility Milw, WI 53205

what - On 11/12/18 thru 11/13/18 security Director miller  
Captain Gegare, Captain morris, Psychologist Doctor  
<sup>HOFFELER</sup> Hoffman, an Doctor mequire failed to make sure i was  
given range of motion every two hours, They failed to give  
me water every 1 hour They fail to provide hourly bathroom  
They fail to provide a bath or shower once each 24 hours

or more often when ~~nesser~~ necessary.

when- On 11/12/18 thru 11/13/18 prison captain Gegare  
captain morris, security Director miller and both  
Psychologist Hoffman and Mcquire fail to abide by  
Department of mental Health rules and regulations

where Milwaukee secure Detention Facility 5<sup>th</sup> floor Apod  
observation and controlled seperation in segregation

why Neglect and failed to give proper attention too.  
Insufficient training, DELIBERATE INDIFFERENCE.

My 8<sup>th</sup> Amendment was violated of the constitution

( 51 D.C. REG 11863 517.10 → A-G. )  
of Department of Mental Health  
Rules and regulation.

( Four Point restraints 5.1 D.C. REG 1896 §519.2 (c) )

I was place in 4 point restraints for 8 hours without  
no range of motion, no water, no hourly restroom, no  
shower or bath after soil myself for 3 days.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I would like to be compensated monetary damages of 15,000,000 ~~per~~ For pain and suffering and mental anguish, Punitive to deter future misconduct of other inmates compensate 15,000,000.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 6 day of 5 MAY 20 19.

Respectfully Submitted,

  
Signature of Plaintiff

00262012  
Plaintiff's Prisoner ID Number

Milwaukee secure Detention Facility

P.O. Box 05911 Milw WI 53205  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.